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Attorneys for Defendant Bethel Solutions Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

KAREN PRIMERA,

Plaintiff,

v.

BETHEL SOLUTIONS, INC.,

Defendant.

Case No. 3:20-cv-00157-JMK

**NOTICE OF REMOVAL OF CASE FROM STATE COURT
(SUPERIOR COURT CASE NO. 3AN-20-06026CI)**

TO THE DISTRICT COURT OF THE UNITED STATES, DISTRICT OF
ALASKA, AND TO THE PLAINTIFF AND HIS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that Defendant, Bethel Solutions, Inc.,
contemporaneous with the filing of this Notice, is effectuating the removal of the above-
referenced action from the Superior Court of the State of Alaska, Third Judicial District,

to the United States District Court for the District of Alaska. A true and correct copy of the Notice to Superior Court of Filing Notice of Removal filed in Case No. 3AN-20-06026CI is attached hereto as **Exhibit A**. The removal is based on the following grounds:

1. On or about April 28, 2020, there was filed in the Superior Court for the State of Alaska the above-titled action, Case No. 3AN-20-06026CI.

2. A true and correct copy of the Complaint is attached hereto as **Exhibit B** and is incorporated by reference herein as though fully set forth.

3. On or about June 5, 2020, an Amended Complaint was filed in the Superior Court for the State of Alaska, Case No. 3AN-20-06026CI.

4. On or about June 9, 2020, the Defendant was served with a copy of the Amended Complaint and Summons, via certified mail, at the offices of its registered agent in Anchorage, Alaska.

5. A true and correct copy of the Amended Complaint is attached hereto as **Exhibit C** and is incorporated by reference herein as though fully set forth.

6. The United States District Court has jurisdiction over the superior court action in this matter, based on original jurisdiction pursuant to 28 U.S.C. § 1331, and the action may be removed pursuant to 28 U.S.C. § 1441(a) as it arises under 29 U.S.C. § 201 *et seq.* for which a cause of action in federal court is provided pursuant to 29 U.S.C. § 216(b).

7. This notice of removal is timely filed in that it is filed within 30 days of receipt of a copy of the complaint by Defendant, which sets out a claim for relief.

8. Defendant expressly consents to this notice of removal.

9. The notice to State Superior Court of the notice of removal is being filed contemporaneously with this notice in federal court.

DATED this 29th day of June, 2020, at Anchorage, Alaska.

DUCEY & ASSOCIATES LLC
Attorneys for Defendants

/s/ Cynthia L. Ducey
Alaska Bar No. 8310161

CERTIFICATE OF SERVICE

I certify that on June 29, 2020, a copy of the foregoing document was served electronically on:

Isaac D. Zorea
Attorney at Law
P.O. Box 210434
Anchorage AK 99521
eyedz@gci.net

/s/ Cynthia L. Ducey

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